

First, it is to be noted that the claims are directed to a machine that performs ink-jet printing. Each of claims 1, 19 and 20 recites a machine having at least one ink-jet head.

The rejection of the claims asserts that the recitation of an ink-jet head "inherently reads on column 2, lines 5-31 of the Lo patent." It is respectfully submitted that the presence of an ink-jet head is not inherent in the cited passage. Rather, this passage pertains to a different type of printing, and therefore teaches away from using an ink-jet printer.

As discussed during the above-mentioned interview, the Lo patent discloses an entirely different type of process for printing images. Referring to Figure 1, light from a lamphouse 10 is projected through a negative in a mount 23, to expose a section of lenticular print material 110. To enable an image to be formed, therefore, this lenticular print material contains a photosensitive emulsion. See column 1, lines 20-26. As is well known, after the emulsion is exposed to light, it must be developed, using a chemical process, to render a visible image. For this purpose, therefore, the Lo patent discloses a chemical processor 130 for developing the exposed print material. The cited passage at column 2, lines 5-31, describes different types of chemical processors that can be employed for this purpose.

It is respectfully submitted that the disclosure of a photosensitive print material, and the use of a chemical processor to develop exposed print material, teaches away from an ink-jet printer. In an ink-jet printer, the image is visible as soon as the ink is deposited onto the print medium. There is no need for any subsequent chemical processing. Accordingly, the Lo patent's disclosure of a printer

with a chemical processor does not suggest an ink-jet printer, either inherently or otherwise.

For this reason alone, it is respectfully submitted that the Lo patent does not anticipate the subject matter of the rejected claims.

Second, it is respectfully submitted that the video cameras that are disclosed in the Lo patent perform an entirely different function from the computer-aided vision device that is in the pending claims. Referring again to Figure 1 of the Lo patent, the purpose of the two cameras 52 and 54 is to capture the image that is produced by the negative, and display that image on a pair of monitors 80 and 82. One of the cameras presents a full-frame image, for purposes of cropping, key subject selection, and color analysis. The other camera has a longer focal-length lens, and captures an enlarged section of the image that includes the key subject and immediately surrounding areas.

Thus, it can be appreciated that the two video cameras 52 and 54 capture the actual image that is to be printed on the lenticular print material 110. In other words, they capture and display the *content* of the printed image.

In contrast, the computer-aided vision device of the claims captures information relating to the card *medium* onto which the ink-jet printing is to occur. This information is employed to control the ink-jet head, so that printing occurs in certain areas but not in others. For instance, in the case of a credit card having a magnetic stripe, printing over the area of the stripe is avoided.

The computer-aided vision device recited in the claims obtains information that is different from the video cameras of the Lo patent, to perform an entirely different function. It is respectfully submitted that the disclosure of the Lo patent

does not anticipate the subject matter of the claims. For instance, claim 1 recites a computer-aided vision device "for dynamic discrimination between areas on a *surface of the card medium . . .*" Claim 19 recites that the computer-aided vision device performs "dynamic measurement of geometric and/or positioning parameters of the *storage card*." Claim 20 recites that the computer-aided vision device dynamically detects "the position of at least one feature of the *storage card*." The claims explicitly recite that the vision device provide information pertaining to the card itself, i.e the print medium. There is no disclosure in the Lo patent to suggest that the video cameras 52 and 54 obtain any of these types of information about the lenticular print material 110. Rather, they only obtain information about the image that is formed by the negative.

In summary, the information that is obtained by the video cameras of the Lo patent enable the user to control the content that is to be exposed onto the print material. The information that is obtained by the computer-aided vision device of the pending claims enables the controller to control the area on the card medium where printing is performed. In other words, the video cameras of the Lo patent identify *what* is to be printed, whereas the computer-aided vision device of the claims is used to identify *where* an image is to be printed. The two types of information are entirely distinct from one another. As a result, the controls that are implemented with these two types of information are also different. There is no disclosure in the Lo patent suggesting that the video cameras 52 and 54 perform any of the functions recited in the claims.

For this additional reason, therefore, the subject matter of the claims is not anticipated by the Lo patent. Furthermore, the various secondary references do not

overcome the above-noted differences between the claimed subject matter and the disclosure of the Lo patent.


In view of the foregoing, it is respectfully submitted that all pending claims are patentably distinct from the cited prior art. Reconsideration and withdrawal of the rejections is respectfully requested.

Respectfully submitted,

BUCHANAN INGERSOLL AND ROONEY PC

Date: May 17, 2007

By: _____



James A. LaBarre

Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620